

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as
President of the United States; et al.,

Defendants.

C.A. No. 1:25-cv-128

DECLARATION OF BLAKE DOE

Pursuant to 28 U.S.C. § 1746, I, Blake Doe, hereby declare as follows:

1. I am currently employed by the Institute of Museum and Library Services (IMLS). I am over the age of 18 and have personal knowledge of all the facts stated herein, except those matters stated upon information and belief; as to those matters, I believe them to be true.

2. I am submitting this declaration pseudonymously because I fear retaliation. But if the Court would like to know my name or job position, I would be willing to provide it ex parte and under seal.

3. This declaration supplements the declaration I submitted on April 3, 2025, with information that I have learned since that date.

4. On or before April 2, 2025, IMLS terminated at least 15 grants, including grants to California, Connecticut, and Washington under its “Grants to States” program and a number of other grants to museums and libraries.

5. On April 9, 2025, IMLS terminated the large majority of its remaining grants. It is my understanding that, on that date, IMLS terminated well over 1,000 grants. To my knowledge,

each termination notice stated both that the grant was “no longer consistent with the agencies priorities” and that the President’s March 14, 2025, executive order “mandates that the IMLS eliminate all non-statutorily required activities and functions.”

6. I have also learned that, currently, only two individuals are working in the Office of Library Services. Only one of those individuals has experience as a program officer. The other individual, who is currently serving as the acting deputy director of the Office of Library Services, is an administrative assistant who has no experience administering the agency’s grants or library grant programs.

7. Similarly, I have learned that only two individuals are currently working in the Office of Museum Services. Only one of those individuals is a program officer and the other is an acting deputy director.

8. In addition, I have learned that the only individual currently working in the Office of the Chief Financial Officer is the Chief Financial Officer. That individual does not have experience handling the technical aspects of processing payment requests, and it is my expectation that he would not be technically capable of issuing disbursements or reimbursements in a timely manner.

9. I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on April 11, 2025.

/s/ Blake Doe
Blake Doe